

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

**KAUFMAN DOLOWICH LLP**

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STEVEN J. FRATO JR.,

Plaintiff,

v.

CAPITAL MANAGEMENT  
SERVICES L.P.,

Defendant.

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CIVIL ACTION

Case No. 3:23-CV-04049-MAS-JBD

**APPLICATION FOR EXTENSION OF TIME TO  
ANSWER, MOVE OR OTHERWISE REPLY (L.Civ.R. 61(b))**

Application is hereby made for a Clerk's Order extending time within which Defendant Capital Management Services L.P. ("Defendant") may answer, move or otherwise reply to the Amended Complaint filed by Plaintiff Steven J. Frato, Jr. ("Plaintiff") herein and it is represented that:

1. On January 8, 2025, this Court granted Defendant's Motion to Dismiss Plaintiff's Complaint without prejudice (Docs. 14-15);

2. In the January 8, 2025 Order, the Honorable Michael A. Shipp directed that Plaintiff may file an Amended Complaint within thirty (30) days from the entry of the Order, or until February 9, 2025. (Doc. 15). This deadline was extended to February 10, 2025 pursuant to Rule 6(a)(1)(C) of the Federal Rules of Civil Procedure as February 9, 2025 was a Sunday.

3. On February 10, 2025, Plaintiff filed an Amended Complaint against Defendant. (Doc. 16);

4. Defendant's time to Answer, Move or otherwise Reply to Plaintiff's Amended Complaint expires on February 24, 2025.

Respectfully submitted:

**KAUFMAN DOLOWICH LLP**

BY: /s/ Monica M. Littman  
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Attorneys for Defendant Capital Management  
Services, L.P.

Dated: February 18, 2025

**ORDER**

The above application is ORDERED GRANTED. Defendant's time to answer, move or otherwise reply in response to Plaintiff's Amended Complaint is extended to March 10, 2025.

ORDER DATED: \_\_\_\_\_

William T. Walsh, Clerk

By: \_\_\_\_\_  
Deputy Clerk

**CERTIFICATE OF SERVICE**

I, MONICA M. LITTMAN, ESQUIRE, hereby certify that on this date I served a true and correct copy of the foregoing electronically via email on the following:

Steven J. Frato, Jr.  
22 Lilac Lane  
Barnegat, NJ 08005  
[fratosteven@gmail.com](mailto:fratosteven@gmail.com)  
Pro Se Plaintiff

/s/ Monica M. Littman  
MONICA M. LITTMAN

Date: February 18, 2025.